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March 13, 2015

VIA CERTIFIED MAIL AND EMAIL

Kathleen H. Johnson
Director, Enforcement Division
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Scott Janoe
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FAX: 7132297953
scott.janoe@bakerbotts.com

Re: Fourth Response of Halliburton Energy Services Inc. to the January 27, 2015
Request for Information Pursuant to Section 114 of the Clean Air Act Regarding
Compliance with California Air Resource Board's Truck and Bus Regulation

Dear Ms. Johnson:

Attached to this letter is the fourth response of Halliburton Energy Services Inc. ("Halliburton") to the above-referenced request.

Pursuant to the schedule agreed to on February 13, 2015, Halliburton provided an initial response to Questions 1-6 on February 18, 2015. A second response regarding Halliburton's compliance with the Truck and Bus Regulation phase-in schedule was provided on February 27, 2015. A third response addressing Question 8, regarding trucks hired or dispatched by Halliburton, was provided on March 6, 2015. This response supplements the March 6 attachment. Halliburton will continue supplementing its response to Question 8 on a weekly basis until all information has been collected for each previously-identified vendor.

In addition to responding to the January 27, 2015 request for information, and pursuant to a conversation with Janice Chan and Daniel Reich on March 9, 2015, Halliburton is also providing additional information regarding its efforts to comply with the Truck and Bus Regulation.

Halliburton is continuing to search its files and the files of its vendors for responsive information and will supplement its response should additional information be provided. If you have any questions about this cover letter or the enclosed attachment, please contact me at scott.janoe@bakerbotts.com or 713.229.1553.

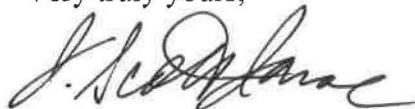
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Kathleen H. Johnson

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March 13, 2015

Very truly yours,

A handwritten signature in black ink, appearing to read "S. Janoe", written in a cursive style.

Scott Janoe

cc: Janice Chan, ENF-2-1, U.S. EPA Region 9

FOURTH RESPONSE OF HALLIBURTON ENERGY SERVICES INC. TO JANUARY 27, 2015 REQUEST

8. *For each company identified by Halliburton in Request 12.a of the Response Letter, provide the following information:*
- a) *The name of the hired company; and*
 - b) *Number of trucks hired for each job/contract or for each CY 2012, 2013, and 2014.*

Halliburton objects to this request as it asks for information that is not required by the Truck and Bus Regulation. The Truck and Bus Regulation does not require Halliburton to keep records for all trucks it hires or dispatches, only those vehicles that are subject to the regulation. Accordingly, Halliburton has interpreted this request to provide the number of vehicles subject to the Truck and Bus Regulation that were hired or dispatched for each job/contract or for each calendar year 2012, 2013, and 2014.

As stated in Halliburton's November 7, 2014 response, the list of vendors provided in response to the June 16, 2014 request consisted of vendors used by Halliburton's Bakersfield terminal during the applicable period for a variety of trucking, towing and rental services which may have involved the hiring or dispatching of a diesel-fueled vehicle with a GVWR greater than 26,000 and an engine model year prior to 2007.

Though Halliburton keeps records of all its vendor interactions, including jobs and contracts that involve vendor-provided vehicles, these records are not in a form that is readily searchable for the purposes of responding to Question 8. Halliburton has reached out to the vendors identified in Halliburton's November 7 response, requesting additional information about regulated vehicles provided by each vendor for each job or contract for each calendar year from 2012 to 2014. By using the information provided by these vendors as a cross-reference, Halliburton will be able to more fully and accurately respond to Question 8.

Halliburton has received responses from the following vendors and can provide the following information regarding the number of regulated vehicles hired or dispatched for 2012, 2013, and 2014:

| | |
|------------|------------|
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] |

| | |
|------------|--------------------------|
| [REDACTED] | [REDACTED] [REDACTED] |
| [REDACTED] | [REDACTED] [REDACTED] |

Halliburton will continue to supplement its response on a weekly basis until it has information for each previously-identified vendor.

**ADDITIONAL INFORMATION REGARDING HALLIBURTON'S COMPLIANCE EFFORTS FOR TRUCK
AND BUS REGULATION**

Halliburton has implemented a compliance program for the Truck and Bus Regulation since 2012.

- In early 2012, Halliburton began moving regulated vehicles with engines that did not meet the PM BACT and 2010 model year engine emission requirements out of its California fleet. As seen in the spreadsheet that accompanied Halliburton's November 7, 2014 response, Vehicle Numbers 34 through 107 were sent to Halliburton facilities and reclamation facilities in other states. The vast majority of Halliburton's potentially regulated vehicles were relocated or reclaimed by the end of 2013.
- Halliburton began the process of retrofitting older regulated vehicles that would remain a part of its California fleet in 2013. During November and December 2013, Halliburton worked with its first DPF vendor, Performance Diesel and Truck, to complete the data logging necessary to determine the brand and filter size needed for each vehicle Halliburton would retrofit. Halliburton entered into the first purchase order for these DPFs in February 2014. Due to the volume of orders and the backlog experienced by Performance Diesel and Truck, the first DPF installation occurred in March 2014. A similar backlog was experienced by Halliburton's second DPF vendor, California Environmental Services. All DPFs were installed by October 31, 2014.